



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 05 2016

CERTIFIED MAIL #7009 1680 0000 7648 7399
RETURN RECEIPT REQUESTED

Ms. Gayle Brannon
Manager
Herr Voss Stamco RCI, Inc.
1079 Industry Drive Lot 1
Chesterton, Indiana 46304

Re: Notice of Violation
RCRA Compliance Evaluation Inspection – Herr Voss Stamco
EPA ID No.: INR 000 105 213

Dear Ms. Brannon:

On November 16, 2015 a representative of the U.S. Environmental Protection Agency inspected the Herr Voss Stamco RCI, Inc. (Herr Voss Stamco) facility, located in Chesterton, Indiana. As a large quantity generator of hazardous waste, Herr Voss Stamco is subject to the Resource Conservation and Recovery Act (RCRA); 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Herr Voss Stamco's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Herr Voss Stamco, EPA's review of records pertaining to Herr Voss Stamco, and the inspector's observations, EPA has determined that Herr Voss Stamco has unlawfully stored hazardous waste without a permit or interim status as a result of Herr Voss Stamco's failure to comply with certain conditions for a permit exemption under Indiana regulations at 329 IAC § 3.1-7-1 [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Herr Voss Stamco was out of compliance at the time of the inspection in paragraphs 1, 2 and 3, below.

Many of the conditions for the RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to failure to comply with an exemption condition incorporated by reference into the Indiana regulations at 329 IAC § 3.1-7-1, the generator (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirements. The exemption conditions identified in paragraphs 1 and 2 are also independent TSD requirement incorporated from at 329 at 329 IAC § 3.1-7-1. Accordingly, each failure of Herr Voss Stamco to comply with these conditions is also a violation of the corresponding requirement in 329 IAC § 3.1-7-1 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or 329 IAC § 3.1-9-1 [40 C.F.R. Part 264] (if the facility should have been permitted).

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Herr Voss Stamco was out of compliance with the following large quantity generator permit exemption conditions:

The permit exemption conditions identified below in paragraphs 1 and 2 are independent TSD requirements violated by Herr Voss Stamco.

Contingency Plan

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must submit a copy of its contingency plan and revisions to the plan to the local police department, fire department, hospital and state and local emergency response teams that may be called upon to provide emergency services. See, 329 IAC §§ 3.1-7-1 and 329 IAC 3.1-10-1 [40 CFR §§ 262.34(a) (4) and 265.53(b)].

At the time of the inspection, Herr Voss Stamco had not submitted a copy of the facility contingency plan to the local police and fire departments that may be called upon to provide emergency services.

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator's written contingency plan must include, among other things, the names,

addressees, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. See, 329 IAC §§ 3.1-7-1 and 329 IAC 3.1-10-1 [40 CFR §§ 262.34(a) (4) and 265.53(d)].

At the time of the inspection, Herr Voss Stamco's contingency plan did not designate a specific person as the primary emergency coordinator nor did it include the primary or alternate coordinator's home addresses, and phone numbers (office and home).

Date When Each Period of Accumulation Begins

3. Under 329 IAC § 3.1-7-1 [40 CFR § 262.34(a) (2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, Herr Voss Stamco maintained one 55-gallon container of hazardous waste solids that was not marked with the date upon which the period of accumulation of hazardous waste began in the less than 90-day hazardous waste storage area.

During the inspection, as observed by EPA, and after the inspection, as documented in November 18 and 19, 2015 emails to EPA, you took certain actions to establish compliance with the above contingency plan and accumulation time requirements. Based on that information, EPA is not planning additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Herr Voss Stamco's cooperation.

If you have any questions regarding this letter, please contact Ms. Sheila Burrus, of my staff, at (312) 886-3587.

Sincerely,



Margaret M. Guerriero

Director

Land and Chemicals Division

Enclosure

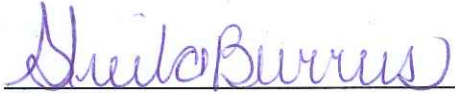
cc: Nancy Johnston, Indiana Department of Environmental Management
(njohnston@idem.in.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Herr Voss Stamco RCI, Inc.
U.S. EPA ID. No.: INR 000 105 213
LOCATION ADDRESS: 1079 Industry Drive Lot 1
Chesterton, Indiana 46304
DATE OF INSPECTION: November 16, 2015
U.S. EPA INSPECTORS: Sheila Burrus, RCRA Hazardous Waste

PREPARED BY:



Sheila Burrus
Environmental Protection Specialist

12/15/15

Date:

APPROVED BY:



Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

12/15/15

Date:

Purpose of Inspection

The purpose of the inspection was to conduct an unannounced compliance evaluation inspection (CEI) at Herr Voss Stamco RCI, Inc. (Herr Voss Stamco), located at 1079 Industry Drive Lot 1, Chesterton, Indiana, to evaluate Herr Voss Stamco's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the management of hazardous waste and used oil.

Participants: Gayle Brannon and Bill Donaldson represented Herr Voss Stamco. Sheila Burrus represented EPA Region 5.

Installation Description/Background

The Herr Voss Stamco facility specializes in the reconditioning of mill rolls, chrome plating and electro discharge texturing. The manufacturing processes include milling, machining, grinding, turning and fabrication. The facility has two 60 inch grinders, two 3 inch grinders and one 30 inch grinder.

Herr Voss Stamco has one less than 90-day hazardous waste storage area and one hazardous waste satellite accumulation area located within the plating department.

The facility switched to a non-hazardous chemical (cleaning solution) to clean parts in its part washer on January 8, 2015. Herr Voss Stamco currently generates nonhazardous waste liquid from its parts washer.

Herr Voss Stamco performed a cleaning of its plating bath and replaced tank bottoms in January 2015.

Herr Voss Stamco generates a special waste from grinding mill rolls that comes from its customers for reconditioning. The metal grinding swarf from the grinding operation is collected into hoppers and then transferred into a 30 yard roll off dumpster located outdoors.

Herr Voss Stamco was last inspected by the Indiana Department of Environmental Management on August 8, 2013.

A review of hazardous waste manifests and waste volume on-site indicates that Herr Voss Stamco has been operating as a large quantity generator.

Waste Generation

The primary waste streams generated at this installation are chromium contaminated solids (rags, plastic bags, tank liners, filter paper) from its plating operation; and chromium contaminated liquid and sludge from tank clean-outs.

Herr Voss Stamco also generates used oil from maintenance operations and universal waste lamps. There were no waste lamps on-site at the time of the inspection.

Opening Conference

I arrived at Herr Voss Stamco at 8:40 a.m. on November 16, 2015. I introduced myself and presented my enforcement credentials to personnel at the receptionist desk and explained my visit. When Gayle Brannon arrived at the receptionist desk to assist me, I presented my enforcement officer credentials to her and explained that I was there to conduct a compliance evaluation inspection.

We then proceeded into a conference room where I explained to Ms. Brannon that I would be conducting a compliance evaluation inspection that included a visual site inspection and records review. I then proceeded to conduct the opening conference by explaining what specific records I would need to review.

I informed Ms. Brannon that Herr Voss Stamco could claim any information gathered during the inspection as Confidential Business Information (CBI) including: verbal communication, documents, and photographs. Herr Voss Stamco did not make a CBI claim on the information gathered during the inspection.

I asked Ms. Brannon for a brief description of the type of work done at this installation and types of wastes generated. Ms. Brannon provided background and waste stream information about Herr Voss Stamco which is included above in the installation description/background section of this report.

I provided a Small Business Resource Information Sheet, the U.S. EPA – Region 5 Pollution Prevention State Contact list, Illinois Waste Management Research Sustainable Solutions Brochure and the U.S. EPA Managing Used Oil Advice for Small Business brochure.

I continued the opening conference by asking who picks up Herr Voss Stamco's hazardous waste and used oil. Ms. Brannon indicated that Advanced Waste Services located in West Allis, Wisconsin picks up its hazardous waste and transfers it to Clean Harbors, Vickery Environmental Services or Safety Kleen for disposal.

Advanced Waste Services located in West Allis picks up its used oil.

I began the CEI by conducting the visual site portion of the inspection.

Visual Site Inspection

I was accompanied by Ms. Brannon and Mr. Donaldson during the VSI portion of the inspection. The areas of the Herr Voss Stamco facility I inspected included, but were not limited to: lathe area (grinding of large parts), leveler rolls (grinding of small parts), welding area, electro discharge texturing area (similar to sandblasting), chrome plating area, 90-day and satellite accumulation hazardous waste storage areas and used oil tank storage area.

The following is a summary of information obtained while touring the above areas.

- There were three 55-gallon containers of hazardous waste solids (chromium rags, bags and debris) located in the less than 90-day hazardous waste storage area. All three containers had hazardous waste labels with descriptions of the contents but only two of the containers were dated. One container had a date of 9/22/2015 and the other container was dated 11/16/2015. I asked Ms. Brannon about the undated container. Ms. Brannon stated that she was unaware that the container was not dated due to the positioning of the drum when she conducted her last inspection on 11/10/15. Ms. Brannon said that she could see the hazardous waste label on the container but not the information on the label. Ms. Brannon said based on her records and discussion with staff, the drum filled date for the unlabeled container should have been 10/18/15. The container was back dated 10/18/15 (Photograph 1).
- There was one closed/labeled 55-gallon satellite accumulation container of chrome waste located at the chrome plating line (Photograph 2).
- There was a labeled 300 gallon used oil tank located in the truck bay area.
- Additional photographs taken throughout the facility (Photographs 3 through 8).

Records Review

For the records review, I informed Ms. Brannon that I wanted to review the contingency plan, waste analysis plan, hazardous waste manifests, land disposal restriction records, weekly inspection logs for the hazardous waste storage area, annual or biennial reports, training records and job descriptions.

My observations are categorized below:

Contingency Plan

Herr Voss Stamco was unable to provide documentation showing that a copy of the contingency plan had been sent to the local hospital and police departments. I received documentation showing that a copy of its contingency plan was received by the local hospital and police department on November 19, 2015.

Herr Voss Stamco's contingency plan does not designate a specific person as the primary emergency coordinator nor does it include the primary or alternate coordinators home addresses/phone numbers. I received documentation identifying the primary and alternate emergency coordinators and home addresses/phone numbers on November 18, 2015.

Weekly Inspection Logs

I reviewed weekly inspection logs for the years 2014 and 2015. I did not see any notes in the weekly inspection log stating the inability to read hazardous waste labels due to positioning of the container. Ms. Brannon said that weekly inspections were performed in the year 2013 but were not documented.

I reviewed hazardous waste manifests, land disposal restriction forms, waste analysis data, hazardous waste training records and biennial reports. I found the above records provided for review to be complete.

I observed fire extinguishers and eyewash stations throughout the facility.

Closing Conference

In closing, a conference was held with Ms. Brannon and Mr. Donaldson. I summarized where I had been taken during the VSI and what information Ms. Brannon presented to me. I thanked everyone for their cooperation and concluded the CEI at approximately 11:30 a.m.

Attachments

Inspection Checklist
Photographs 1 and 8



PHOTOGRAPH: 1

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 16, 2015

LOCATION OF PHOTOGRAPH:

Chrome Plating Area/90-day H.W. Storage Area

SCENE BEING PHOTOGRAPHED:

three closed/labeled 55-gallon containers of hazardous waste solids...one container without a date

SITE LOCATION:

1079 Industry Drive Lot 1
Chesterton, Indiana 46304

INSTALLATION NAME:

Herr Voss Stamco

INSTALLATION I.D. #

INR 000 105 213



PHOTOGRAPH: 2

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 16, 2015

LOCATION OF PHOTOGRAPH:

Chrome Plating Area

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon satellite accumulation container
of hazardous waste solids

SITE LOCATION:

1079 Industry Drive Lot 1
Chesterton, Indiana 46304

INSTALLATION NAME:

Herr Voss Stamco

INSTALLATION I.D. #

INR 000 105 213



PHOTOGRAPH: 3

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 16, 2015

SCENE BEING PHOTOGRAPHED:

Leveler Rolls-grinding of small parts

SITE LOCATION:

1079 Industry Drive Lot 1
Chesterton, Indiana 46304

INSTALLATION NAME:

Herr Voss Stamco

INSTALLATION I.D. #

INR 000 105 213



PHOTOGRAPH: 4

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 16, 2015

LOCATION OF PHOTOGRAPH:

Welding Area

SITE LOCATION:

1079 Industry Drive Lot 1
Chesterton, Indiana 46304

INSTALLATION NAME:

Herr Voss Stamco

INSTALLATION I.D. #

INR 000 105 213



PHOTOGRAPH: 5

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 16, 2015

LOCATION OF PHOTOGRAPH:

Grinding Area

SITE LOCATION:

1079 Industry Drive Lot 1
Chesterton, Indiana 46304

INSTALLATION NAME:

Herr Voss Stamco

INSTALLATION I.D. #

INR 000 105 213



PHOTOGRAPH: 6
NAME OF PHOTOGRAPHER: Sheila Burrus
DATE OF PHOTOGRAPH: November 16, 2015
LOCATION OF PHOTOGRAPH: Sandblasting Area
SITE LOCATION: 1079 Industry Drive Lot 1
Chesterton, Indiana 46304
INSTALLATION NAME: Herr Voss Stamco
INSTALLATION I.D. # INR 000 105 213



PHOTOGRAPH: 7

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 16, 2015

LOCATION OF PHOTOGRAPH:

Truck Bay Area

SCENE BEING PHOTOGRAPHED:

labeled 300-gallon used oil tank

SITE LOCATION:

1079 Industry Drive Lot 1
Chesterton, Indiana 46304

INSTALLATION NAME:

Herr Voss Stamco

INSTALLATION I.D. #

INR 000 105 213



PHOTOGRAPH: 8
NAME OF PHOTOGRAPHER: Sheila Burrus
DATE OF PHOTOGRAPH: November 16, 2015
LOCATION OF PHOTOGRAPH: outdoor
SCENE BEING PHOTOGRAPHED: 30-yard roll-off box for grinding swarf
SITE LOCATION: 1079 Industry Drive Lot 1
Chesterton, Indiana 46304
INSTALLATION NAME: Herr Voss Stamco
INSTALLATION I.D. # INR 000 105 213

U.S. EPA Generator Checklist for Indiana

1/20/2016

PART 262: Standards Applicable to Generators of Hazardous Waste

#	40 CFR	NA = Not Applicable, NI = Not Inspected, OK = In Compliance, DF = Deficiency	NA	NI	OK	DF
GENERAL			NA	NI	OK	DF
1	262.11	Hazardous Waste Determination (characteristic, listed, TCLP, knowledge, exclusions)			✓	
2	262.12(a)	EPA Identification Number (Generator must have ID number)			✓	
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number.			✓	
THE MANIFEST			NA	NI	OK	DF
329 IAC 3.1-7/4-6 & 8 & 11						
4	262.20	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)			✓	
5	262.21	Manifest Acquisition (generator state 1st, consignment state 2nd)			✓	
6	262.22	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)			✓	
7	262.23	Manifest Use (signature & date: generator, transporter, TSD, keep copy)			✓	
8	329 IAC 3.1-7-4	Indiana Manifest required for hazardous waste shipped to Indiana TSD Facilities			✓	
9	329 IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping			✓	
PRE-TRANSPORT REQUIREMENTS						
NOTE: If facility treats in < 90 day tanks or containers, see 268.7						
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported)			✓	
LARGE QUANTITY GENERATORS			NA	NI	OK	DF
11	262.34(a)	90 Day accumulation limit: Generator may accumulate on-site for 90 days or less provided that:			✓	
12	262.34(a)(1)	Waste is placed in tanks, containers, containment building, or drip pad			✓	
13	262.34(a)(2)	Container marked with start of accumulation date				✓
14	262.34(a)(3)	Container/tank marked "Hazardous Waste"			✓	✓
15	262.34(b)	30 Day extension				
SATELLITE CONTAINERS			NA	NI	OK	DF
16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)			✓	
17	262.34(c)(i)	i) Container must be closed when not in use, in good condition, and compatible with waste			✓	
18	262.34(c)(ii)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator			✓	

U.S. EPA Generator Checklist for Indiana

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19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days				
SMALL QUANTITY GENERATOR			NA	NI	OK	DF
20	262.34(d)(e) (f)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site 6000 kg. or less, must follow:	✓			
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"	✓			
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.	✓			
23	262.34(d)(5)	i) Emergency coordinator identified	✓			
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers	✓			
25	262.34(d)(5)	iii) Employees must be familiar with handling and emergency procedures	✓			
26	262.34(d)(5)	iv) Respond to emergencies	✓			
RECORD KEEPING			NA	NI	OK	DF
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, biennial report, exception report, test results, waste analysis/determination, extension time for unresolved enforcement.)			✓	
28	262.41	Biennial Report (due March 1 even numbered years) (LQG ONLY)			✓	
29	262.42	Exception Reporting (LQG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM, (SQG: >60 days) transportation report to IDEM)			✓	
30	262.43	Additional Reporting, if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR 261)			✓	
31	262.44	SQG Recordkeeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis)				
EXPORTS			NA	NI	OK	DF
32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)	✓			
33	262.53	Notification of Intent to Export				
34	262.54	Special Manifest Requirements for Primary Exporters				
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)				
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)				
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)				
IMPORTS OF HAZARDOUS WASTE			NA	NI	OK	DF
38	262.60	Hazardous Waste Imports (use consignment state's manifest)	✓			

U.S. EPA Generator Checklist for Indiana

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		TSD STANDARDS APPLICABLE TO GENERATORS	NA	NI	OK	DF
		GENERAL FACILITY STANDARDS (NA for SQG)				
39	262.34 / 265.16(a)	Personnel Training (Program Adequacy)			✓	
40	262.34 / 265.16(b)	Personnel received training within six (6) months			✓	
41	262.34 / 265.16(c)	Personnel received annual review			✓	
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records			✓	
		PREPAREDNESS AND PREVENTION	NA	NI	OK	DF
43	262.34 / 265.31	Maintenance & Facility Operation(must be maintained & operated to minimize possibility of release)			✓	
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extinguishers and spill control equipment d. water/foam)			✓	
45	262.34 / 265.33	Testing & Maintenance of Equipment			✓	
46	262.34 / 265.34	Communication & Alarm Access			✓	
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)			✓	
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)			✓	✗
		CONTINGENCY PLAN & EMERGENCY PROCEDURES (NA for SQG)	NA	NI	OK	DF
49	262.34 / 265.51	Contingency Plan for Facility			✓	
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)			✓	
51	262.34 / 265.53	Contingency Plan Available (on-site, <u>local distribution</u>)				✓
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)			✓	
53	262.34 / 265.55	Emergency Coordinator available			✓	
54	262.34 / 265.56	Emergency Procedures followed			✓	
		USE & MANAGEMENT OF CONTAINERS	NA	NI	OK	DF
55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way)			✓	

U.S. EPA Generator Checklist for Indiana

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56	262.34 / 265.172	Waste Compatibility with Container			✓	
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks)			✓	
58	262.34 / 265.174	Inspections (weekly)			✓	
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)			✓	
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)			✓	
LAND DISPOSAL RESTRICTIONS			NA	NI	OK	DF
61	268.3	Dilution prohibited as substitute for adequate treatment			✓	
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.)				
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number				
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years				
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic				
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards				
67	268.45	Treatment standards for hazardous debris				
OTHER			NA	NI	OK	DF
68	IC 13-30	Release of contaminants to environment	✓			
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest				
70	IC 13-30-2-1 (9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:	✓			